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June 15, 2005

FACSIMILE AND FIRST CLASS MAIL

Paul D. Popeo, Esq.
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Exchange Place
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Boston, MA 02109-2809

Re *ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al.*,
Civil Action No. 04-10353 PBS
Our File 2639/509

Dear Paul:

This is to follow up on our conversation this afternoon regarding tomorrow's deposition of Manfred G. Grabherr. You requested that we defer the deposition until after the Markman hearing scheduled for June 17, 2005. As you know, we withdrew our motion to compel Mr. Grabherr on the basis of your representation that you would make the defendant available for his deposition tomorrow. Your eleventh hour request to postpone the deposition is inappropriate and we reject any effort by you to interfere with our right to depose the defendant.

In addition, you indicated that, if we take the deposition as scheduled, you will instruct the witness not to answer trade secrets-related questions and questions regarding his work at VST. This is a direct violation of the Court's Order regarding trade secret discovery in this case and we intend to seek assistance from the Court tomorrow should you interfere with our discovery of evidence in accordance with the Court's Orders.

Sincerely,



Rebecca L. Hanovice

RLH/